

Exhibit “A”

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

SAMMY EL JAMAL,

Debtor.

Chapter 11

Case No. 15-22872 (RDD)

**[PROPOSED] ORDER GRANTING MOTION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR AN ORDER PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004 AUTHORIZING
THE ISSUANCE OF SUBPOENAS FOR THE PRODUCTION
OF DOCUMENTS AND TAKING OF TESTIMONY BY GRAYROCK ACCOUNTING**

Upon the motion dated July 30, 2015 (the “Motion”) of the Official Committee of Unsecured Creditors (the “Committee”) of Sammy El Jamal (the “Debtor”), seeking entry of an order pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) to conduct a Rule 2004 investigation, including, but not limited to, authorizing the issuance of a subpoena duces tecum and ad testificandum for the production of documents and examination under oath, of Grayrock Accounting (“Grayrock”); and the Court having jurisdiction to consider the application and grant the requested relief, and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§1408 and 1409; and the Court having reviewed the Motion and any opposition or response thereto; and that it appearing that notice of the Motion was good and sufficient under the circumstances and that no other or further notice need be given; and it appearing that the Rule 2004 investigation requested by the Committee is within the scope of permissible discovery under Bankruptcy Rule 2004 and that the requested relief is in the best interests of the Debtor’s estate and creditors; and after due deliberation thereon; and good cause appearing therefore,

IT IS HEREBY ORDERED THAT:

1. The Committee is authorized to conduct a Rule 2004 investigation regarding Grayrock's knowledge and information concerning the Debtor's financial affairs, assets, transfers and any other matters concerning the administration of the Debtor's estate.
2. The Committee is authorized to issue a subpoena duces tecum and ad testificandum to Grayrock in the form and substance of the subpoena annexed to the Motion;
3. In the event Grayrock fails to comply with the provisions of this Order, the Committee shall be permitted to seek an immediate conference with the Court (either in person or telephonically), subject only to the Court's availability and provided that the Committee shall give Grayrock or such other recipient at least three days' notice thereof.
4. This Order is without prejudice to the rights of the Committee to apply for further discovery of any material witness or document.

Dated: _____, 2015
New York, New York

HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE